

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,)	Criminal No.	5:20-CR- 243 (CTS)
)		
v.)	Indictment	
)		
DENNIS J. NELSON,)	Violations:	18 U.S.C. § 876(c)
)		[Threat by Mail]
Defendant.)		18 U.S.C. § 115(a)(1)(B)
)		[Impede, Intimidate, and
)		Interfere by Threat]
)		
)	6 Counts	
)		
)	Counties of	Washington and Oneida
)	Offenses:	

THE GRAND JURY CHARGES:

COUNT 1
[Threat by Mail]

On or about August 1, 2018, in Washington County, in the Northern District of New York, the defendant, **DENNIS J. NELSON**, did knowingly deposit in an authorized depository for mail matter to be sent and delivered by the Postal Service, and knowingly cause to be delivered by the Postal Service according to the direction thereon, a communication addressed to a United States Judge that contained a threat to injure the person of the addressee and of others, for the purpose of issuing a threat and knowing that the communication would be perceived as a threat, that is, **DENNIS J. NELSON**, then an inmate incarcerated in the New York State Department of Corrections Great Meadow Correctional Facility, deposited in the mail and caused to be delivered by the United States Postal Service a letter that contained a threat to kill Senior United States

District Judge Thomas J. McAvoy and others with a bomb, in violation of Title 18, United States Code, Section 876(c).

COUNT 2

[Impede, Intimidate, and Interfere With by Threat]

On or about August 1, 2018, in Washington County, in the Northern District of New York, the defendant, **DENNIS J. NELSON**, did threaten to murder Senior United States District Judge Thomas J. McAvoy, with intent to impede, intimidate, and interfere with, and to retaliate against Senior Judge McAvoy while he was engaged in the performance of his official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B).

COUNT 3

[Threat by Mail]

On or about July 15, 2019, in Oneida County, in the Northern District of New York, the defendant, **DENNIS J. NELSON**, did knowingly deposit in an authorized depository for mail matter to be sent and delivered by the Postal Service, and knowingly cause to be delivered by the Postal Service according to the direction thereon, a communication addressed to an officer or employee of the United States Government engaged in the performance of his official duties that contained a threat to injure the person of the addressee and of others, for the purpose of issuing a threat and knowing that the communication would be perceived as a threat, that is, **DENNIS J. NELSON**, then an inmate incarcerated in the New York State Department of Corrections Mohawk Correctional Facility, deposited in the mail and caused to be delivered by the United States Postal Service a letter that contained a threat to kill United States Congressman Anthony Brindisi and others with a bomb, in violation of Title 18, United States Code, Section 876(c).

COUNT 4

[Impede, Intimidate, and Interfere With by Threat]

On or about July 15, 2019, in Oneida County, in the Northern District of New York, the defendant, **DENNIS J. NELSON**, did threaten to murder United States Congressman Anthony Brindisi, with intent to impede, intimidate, and interfere with Congressman Brindisi while he was engaged in the performance of his official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B).

COUNT 5
[Threat by Mail]

On or about July 15, 2019, in Oneida County, in the Northern District of New York, the defendant, **DENNIS J. NELSON**, did knowingly deposit in an authorized depository for mail matter to be sent and delivered by the Postal Service, and knowingly cause to be delivered by the Postal Service according to the direction thereon, a communication addressed to an officer or employee of the United States Government engaged in the performance of his official duties that contained a threat to injure the person of the addressee and of others, for the purpose of issuing a threat and knowing that the communication would be perceived as a threat, that is, **DENNIS J. NELSON**, then an inmate incarcerated in the New York State Department of Corrections Mohawk Correctional Facility, deposited in the mail and caused to be delivered by the United States Postal Service a letter that contained a threat to kill United States Senator Charles Schumer and others with a bomb, in violation of Title 18, United States Code, Section 876(c).

COUNT 6
[Impede, Intimidate, and Interfere With by Threat]

On or about July 15, 2019, in Oneida County, in the Northern District of New York, the defendant, **DENNIS J. NELSON**, did threaten to murder United States Senator Charles Schumer, with intent to impede, intimidate, and interfere with Senator Schumer while he was engaged in the

performance of his official duties, in violation of Title 18, United States Code, Section 115(a)(1)(B).

Dated: September 2, 2020

A TRUE BILL, **NAME REDACTED

[REDACTED]

/ Grand Jury Foreperson

ANTOINETTE T. BACON
Acting United States Attorney

By: Carl G. Eurenus
AUSA Carl G. Eurenus
Assistant United States Attorney
Bar Roll No. 511746